

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

Willie Surgeon, Jr.,)	Case No. 14-43393-399
)	Chapter 13
)	
Debtor.)	
)	
)	
MISSOURI DEPT. OF REVENUE,)	
)	
Movant,)	
)	Debtor's Answer to Motion
vs.)	to Dismiss
)	
Willie Surgeon Jr.,)	
)	
Respondent.)	
)	

DEBTOR'S ANSWER TO MOTION TO DISMISS

Comes now Debtor, Willie Surgeon Jr., by and through his attorney, and answers the Missouri Department of Revenue's Motion to Dismiss, as follows:

1. Debtor admits each and every allegation contained in paragraph 1.

2. Debtor is without sufficient information to admit or deny each and every allegation contained in paragraphs 3 and 6.

3. Debtor denies each and every allegation contained in paragraphs 2 and 5.

4. In response to paragraph 4, Debtor denies each and every allegation in the first sentence. Debtor admits each and every allegation in sentence two.

5. Debtor is in the process of obtaining his income

tax returns and/or affidavits for the year 2011. Debtor requests that this matter be set for hearing.

WHEREFORE, the Debtor prays the Court refuse the Missouri Department of Revenue's Motion to Dismiss and for such other relief as the Court deems just and proper.

RESPECTFULLY SUBMITTED,

CASTLE LAW OFFICES OF ST. LOUIS P.C.

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PROOF OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Debtor's Answer to Motion to Dismiss filed by Missouri Department of Revenue, was mailed to all parties who HAVE NOT BEEN ELECTRONICALLY NOTIFIED, including the Debtors this 26th day of September, 2014.

/s/ Angela Pennington

Missouri Department of Revenue
General Counsel's Office
301 W. High St., Rm. 670
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